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12 *Netflix, Inc.*

15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

17 LYNWOOD INVESTMENTS CY LIMITED,
18 Plaintiff,

19 v.

20 MAXIM KONOVALOV, IGOR SYSOEV,
21 ANDREY ALEXEEV, MAXIM DOUNIN, GLEB
22 SMIRNOFF, ANGUS ROBERTSON, NGINX,
23 INC. (BVI), NGINX SOFTWARE, INC., NGINX,
24 INC. (DE), BV NGINX, LLC, RUNA CAPITAL,
25 Inc., EVENTURE CAPITAL PARTNERS II, LLC
26 and F5 NETWORKS, INC.,

27 Defendants.

Case No. 3:20-cv-03778-MMC (KAW)

**[PUBLIC VERSION] DECLARATION
OF ED BUKOSKI IN SUPPORT OF
NON-PARTY NETFLIX, INC.'S
OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL**

1 I, Ed Bukoski, do hereby declare as follows:

2 1. I am a Senior Software Engineer on the Engineering Tools team at Netflix, Inc.
3 (“Netflix”). Among other responsibilities, I provide operations support for a wide array of
4 developer tools, including source code management and artifact management. I make this
5 Declaration in support of non-party Netflix, Inc.’s Opposition to Plaintiff’s Motion to Compel
6 Netflix, Inc. to Comply with Plaintiff’s Subpoena filed in the above-captioned matter.

7 2. The facts set forth in this Declaration are true according to my own knowledge
8 except to the extent that they are based on my information and/or belief, in which case I have been
9 expressly informed of the facts by other Netflix employees. If sworn as a witness to testify in this
10 matter, I could and would competently testify to the facts set forth herein.

11 3. [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 4. [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 5. [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

25 6. [REDACTED]
26 [REDACTED]
27 [REDACTED]

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[REDACTED]

7. [REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]


9. Conducting the process outlined above would require not only a great deal of

1 technical skill, but also specialized knowledge of Netflix's prior source code that only a small
2 handful of Netflix employees would likely have.

3 10. I declare under penalty of perjury under the laws of the United States of America
4 that the foregoing is true and correct.

5
6 EXECUTED this 19th day of September, 2025 in Los Gatos, California.

7
8 By:


9 Ed Bukoski